Jennifer Louise Jenkins, Administrator ad Litem of the Estate of Sterling L. Higgins v. Obion County, Tennessee, et al.

No. 20-cv-01056 STA-atc

Declaration of Edwin S. Budge

Exhibit M

## IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TENNESSEE EASTERN DIVISION

Administrator <i>ad Litem</i> of the ) ESTATE OF STERLING L. HIGGINS )	
Plaintiff, )	CITE A
v. ) No. 20-cv-01056	STA-atc
OBION COUNTY, TENNESSEE; )	
UNION CITY, TENNESSEE;	
ROBERT THOMAS OSBORNE, Individually; )	
MARY BROGLIN, Individually; )	
WAYLON SPAULDING, Individually; and, )	
BRENDON SANFORD, Individually )	
Defendants.	

#### PLAINTIFF'S DISCLOSURE OF PRIMARY EXPERT WITNESSES

Plaintiff hereby submits the following primary expert disclosures pursuant to Fed. R. Civ. P. 26. The individuals identified below are hereby disclosed as having been retained to provide expert testimony in this case:

- 1. Michael Leonesio, Leonesio Consulting, LLC, 412 South White St., Suite 210, Athens, TN 37303. 423-933-1911. A copy of this expert's report, along with other accompanying information, is provided herewith and incorporated herein.
- 2. J.C. Upshaw Downs, M.D. ForensX, LLC, 1 Diamond Causeway, Suite 21-299, Savannah, GA 31406. 912-507-1008. A copy of this expert's report, along with other accompanying information, is provided herewith and incorporated herein.

3. Allecia Michelle Wilson, M.D., Michigan Medicolegal Consulting, LLC., 3000 Green Rd., Suite 130522. Ann Arbor, MI 48113. 833-330-8652. A copy of this expert's report, along with other accompanying information, is provided herewith and incorporated herein.

4. Matthew DeLaney, M.D., 3106 Whitehall Rd., Birmingham, AL 35209. 251-716-8108. A copy of this expert's report, along with other accompanying information, is provided herewith and incorporated herein.

5. Lori Roscoe, Ph.D., Correctional Healthcare Consultants, 1911 Poinsettia Ave., West Palm Beach, FL 33407. 561-631-2011. A copy of this expert's report, along with other accompanying information, is provided herewith and incorporated herein.

6. Conor McCourt, McCourt Video, 245 West 55<sup>th</sup> St., 10<sup>th</sup> Floor, New York, NY 10019. 914-393-9189. A copy of this expert's report, along with other accompanying information, is provided herewith and incorporated herein. Flash drives, containing this expert's work product, are being physically delivered to defense counsel listed on the Certificate of Service.

DATED this 11th day of February 2021.

THE LAW OFFICE OF DAVID L. COOPER, PC

/s/ David L. Cooper

DAVID L. COOPER, BPR # 11445

Third Avenue North Building 208 Third Avenue, North, Suite 300 Nashville, TN 37201 <a href="mailto:dcooper@cooperlawfirm.com">dcooper@cooperlawfirm.com</a>

(615) 256-1008

# **BUDGE & HEIPT, PLLC**

/s/ Edwin S. Budge

**EDWIN S. BUDGE** 

Washington State Bar No. 24182

ERIK J. HEIPT

Washington State Bar No. 28113 808 E. Roy St. Seattle, Washington 98102 ed@budgeandheipt.com erik@budgeandheipt.com

(206) 624-3060

Attorneys for Plaintiff

### **CERTIFICATE OF SERVICE**

The undersigned certifies that on the date stated below, this document along with the referenced materials were sent via email to the attorneys for the defendants, as identified below:

Michael R. Hill (#17409) W. Michael Varnell, II (#33602) Flippin, Collins & Hill, PLLC P.O. Box 679 Milan, TN 38358-0679 Telephone: (731) 686-8355

mh\_fch@bellsouth.net wmv\_fch@bellsouth.net

Attorneys for Union City Police Department and

Union City, Tennessee

John D. Burleson - #010400 Dale Conder, Jr., #15419 Matthew Courtner, #29113 Rainey, Kizer, Reviere & Bell, PLC 209 East Main Street P. O. Box 1147 Jackson, TN 38302-1147

(731) 423-2414

jburleson@raineykizer.com dconder@raineykizer.com mcourtner@raineykizer.com

Attorneys for Robert Thomas Osborne, Individually

William B. Mauldin (#022912) Nathan D. Tilly (#031318) Pentecost, Glenn & Mauldin, PLLC 162 Murray Guard Drive, Suite B Jackson, TN 38305

Phone: (731) 668-5995
Fax: (731) 668-7163
wmauldin@pgmfirm.com
ntilly@pgmfirm.com

Attorneys for Obion County Sheriff's Department, Mary Brogglin, Waylon Spaulding, and Brendon

Sanford

DATED this 11th day of February, 2021.

### **BUDGE & HEIPT, PLLC**

/s/ Edwin S. Budge

**EDWIN S. BUDGE** 

Washington State Bar No. 24182 808 E. Roy St. Seattle, Washington 98102 ed@budgeandheipt.com (206) 624-3060